

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NATIONWIDE MUTUAL FIRE	:	CIVIL ACTION NO. 10-2410
INSURANCE CO.,	:	
PLAINTIFF	:	
	:	
V.	:	
	:	
FRANCIS MALOFIY,	:	
DEFENDANT	:	

MOTION OF THE DEFENDANT, FRANCIS MALOFIY, FOR AN EXTENSION OF
TIME TO ANSWER THE PLAINTIFF'S MOTION FOR JUDGMENT

The Defendant, Francis Malofiy, by his counsel, Samuel C. Stretton, Esquire, respectfully requests this Honorable Court grant him an additional twenty (20) days to respond to the Plaintiff's Motion for Judgment on the Pleadings for the following reasons:

1. The Plaintiff, Nationwide Mutual Fire Insurance Company, filed a Motion for Judgment on the Pleadings on or about November 29, 2010.
2. Defendant's counsel, Samuel C. Stretton, Esquire, has back to back trials over the next three weeks.
3. Defendant's counsel, Samuel C. Stretton, Esquire, also has three or four major Briefs due.
4. Defendant's counsel, Samuel C. Stretton, Esquire would respectfully request an additional twenty (20) days beyond the normal time period to file an Answer to the Motion for Judgment on the Pleadings.

WHEREFORE, the Defendant, Francis Malofiy, by his counsel, Samuel C. Stretton, Esquire, respectfully requests this Honorable Court grant him an additional twenty (20) days to file an Answer to the Plaintiff's Motion for Judgment on the Pleadings for the reasons above stated.

Respectfully submitted,

s/Samuel C. Stretton
Samuel C. Stretton, Esquire
Attorney for Defendant,
Francis Malofiy
301 South High Street
P.O. Box 3231
West Chester, PA 19381-3231
(610) 696-4243
Attorney I.D. No. 18491

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FRANCIS MALOFIY,	:	
DEFENDANT	:	

CERTIFICATE OF SERVICE

I hereby certify I am this date serving a copy of the Defendant's Motion for an Extension of Time to File an Answer in the captioned matter upon the following persons in the manner indicated below.

Service by First Class Mail addressed as follows:

1. Michael A. Cagnetti, Esquire
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Attorney for Plaintiff,
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2. Jordan S. Derringer, Esquire
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Philadelphia, PA 19102
(215) 564-5190
Attorney for Plaintiff,
Nationwide Mutual Fire Insurance Company

2. Francis Malofiy
1253 Hunt Club Lane
Media, PA 19063

Respectfully submitted,

December 1, 2010
Date

s/Samuel C. Stretton
Samuel C. Stretton, Esquire
Attorney for Defendant,
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